

J. GREGORY CORNETT

DIRECT DIAL 502-560-4210 DIRECT FAX 502-627-8710

gcornett@ogdenlaw.com

1700 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KENTUCKY 40202-2874
(502) 582-1601
FAX (502) 581-9564
www.ogdenlaw.com

July 21, 2005

HAND DELIVERY

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JUL 2 1 2005

PUBLIC SERVICE COMMISSION

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RE: Application of Kentucky Utilities Company for a Certificate of Public

Convenience and Necessity for the Construction of Transmission Facilities in

Franklin, Woodford and Anderson Counties, Kentucky

Case No. 2005-00154

Dear Ms. O'Donnell:

Enclosed please find and accept for filing the originals and ten copies each of Kentucky Utilities Company's Response to Concerned Citizens Against the Power Line Extension's Request for Clarification and Supplemental Data Response in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

J. Gregory Cornett

JGC/ec Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF)		
KENTUCKY UTILITIES COMPANY FOR)		
A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.	RECEIVED
AND NECESSITY FOR THE CONSTRUCTION)	2005-00154	1/2 6/3 demokrati velilini. Istingaria pit tisa. Essavori susani.
OF TRANSMISSION FACILITIES IN)		JUL 2 1 2005
FRANKLIN, WOODFORD AND)		305 2 2 2000
ANDERSON COUNTIES, KENTUCKY)		PUBLIC SERVICE

RESPONSE OF KENTUCKY UTILITIES COMPANY TO CONCERNED CITIZENS' REQUESTS FOR CLARIFICATION

Applicant, Kentucky Utilities Company ("KU"), respectfully submits this response to the filing of the Concerned Citizens Against Power Line Extension ("Citizens") styled "Request for Clarification of KU's Responses to Data Requests" in this proceeding. That filing, made on July 19, 2005, seeks "clarifications" which are, in fact, follow-up or new data requests which are not provided for by the Commission's existing procedural schedule in this matter. In addition to the fact that further discovery is not permitted under that schedule, many, if not all, of these requests would require input from individuals who are presently involved in the hearing before the Commission in Case No. 2003-00266 and thus not available. For these reasons, KU states that it will not provide responses to these "clarification" requests at this time, but that its witnesses will be prepared to respond to those requests at the scheduled hearing on July 26, 2005 should these same questions be asked.

With regard to "clarification" request No. 4, relating to original request No. 8, however, KU states that it did inadvertently fail to directly respond to the second half of that original request. A supplemental response is filed herewith.

Finally, with regard to "clarification" request No. 9, relating to original request No. 19, which request seeks clarification on a legal objection, KU, by counsel, responds that the original objection had multiple grounds, including that the request was overly burdensome. With regard to that specific portion of the objection, however, KU states that it would take significant time and effort to compile the requested information, which is not relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence, for all of its right of way in those three counties. KU has already produced maps showing the locations of its transmission facilities in the area as part of this proceeding.

Dated: July $2 \setminus 2005$

Respectfully submitted,

J. Gregory Cornett 🔾 Ogden Newell & Welch PLLC

1700 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202

Telephone: (502) 582-1601

Robert M. Watt, III Lindsey W. Ingram, III Stoll, Keenon & Park, LLP 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507

Telephone: (859) 231-3000

Elizabeth L. Cocanougher Senior Corporate Counsel Louisville Gas and Electric Company 220 West Main Street Post Office Box 32010 Louisville, Kentucky 40232 Telephone: (502) 627-4850

Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

This is to certify that the foregoing Response has been served by mailing a copy of same, postage prepaid to the following persons on this 2154 day of July 2005:

Mike Cannata Senior Consultant Liberty Consulting Group 65A Ridge Road Deerfield, NH 03037

Mark Lautenschlager Senior Consultant 819 Chipaway Drive Apollo Beach, FL 33572 Laurie K. Dudgeon Robert C. Moore Hazelrigg & Cox, LLP 415 West Main Street Post Office Box 676 Frankfort, KY 40602

Donald T. Spangenberg, Jr. Project Manager Liberty Consulting Group 633 Fairfax Street Denver, CO 80220

Counsel for Kentucky Utilities Company